DECLARATION OF BARRETT S. LITT

- I, BARRETT S. LITT, declare and say:
- 1. I am an attorney at law duly licensed to practice in the State of California and attorney of record for intervenor Mary Sue Hubbard in the afore-entitled matter. I also represent Mrs. Hubbard in other litigation including in the case of Michael J. Flynn v. LaFayette Ronald Hubbard,

 No. 83-2642-C, filed in the United States District Court for the District of Massachusetts on September 13, 1983, in which Mrs. Hubbard has filed a motion for leave to intervene.
- 2. I am personally familiar with the complaint filed by Mr. Flynn in that case, with the allegations regarding liability and damages made by Mr. Flynn, and am also familiar with the additional pleadings that have been filed in that matter. I have attached hereto portions of the record in that case which contain information which has been offered in support of the motion by Mrs. Hubbard and the Church of Scientology of California for summary judgment in the above-entitled matter. Based on my review of the documents submitted in the case of Flynn v. Hubbard, noted above, and my general knowledge as a result of representation of Mrs. Hubbard, I can competently testify to the following:
 - (a) The case of <u>Flynn v. Hubbard</u> seeks a total of \$140 million dollars in damages against Mr. Hubbard. (caption of this case is attached).

- (b) Mr. Flynn has submitted an affidavit in that case in which he states as follows: "I currently represent 35 plaintiffs and defendants in litigation with Scientology." (That portion of Mr. Flynn's affidavit is attached).
- 3. I am also aware, from my general knowledge in representing Mrs. Hubbard, that Mr. Flynn conducted hearings in Clearwater Florida in May, 1982, investigating the Church of Scientology.
- 4. I am also the attorney representing Mary Sue Hubbard in the case of Tonja Burden v. Church of Scientology of California et al., No. 80-501-CIV-T-K, United States District Court for the Middle District of Florida. I know from my personal knowledge and familiarity with that case that attorney Michael J. Flynn is one of the attorneys of record for plaintiff, and that plaintiff has recently filed a motion to default defendant L. Ron Hubbard, and, in support of that motion, has submitted an affidavit of Gerald Armstrong.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 2044 day of October, 1983.

BARRETT S. LITT